

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ACE SECURITIES CORP. HOME EQUITY LOAN
TRUST, SERIES 2007-HE4, by HSBC Bank USA,
National Association, in its capacity as Trustee,

Plaintiff,

-against-

DB STRUCTURED PRODUCTS, INC.,

Defendant.

No. 13 Civ. 2828 (AJN)

Oral Argument Requested

**NOTICE OF DEFENDANT DB STRUCTURED PRODUCTS, INC.'S
MOTION TO DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, the Declaration of David J. Woll dated September 27, 2013 and the exhibits attached thereto, Defendant DB Structured Products, Inc. will move this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined by the court, for an order dismissing the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) and granting Defendant such other and further relief as the Court deems just and proper.

(Signature on next page)

Dated: September 27, 2013
New York, New York

By: /s/ David J. Woll
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Home Equity Loan Trust, Series 2007-HE4, by
HSBC Bank USA, National Association, as
Trustee*